

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH SHOEMAKER and
RICHARD GINDIN, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

**RICHARD ZEITLIN, AMERICAN
TECHNOLOGY SERVICES, LLC,
UNIFIED DATA SERVICES, LLC,
COMPLIANCE CONSULTANTS,
LLC, and JOHN DOES 1-10,**
corporate entities and individuals
presently unknown,

Defendants.

CASE NO. 1:21-cv-01668-CCC

Judge Christopher C. Conner

JOINT NOTICE OF SETTLEMENT

COMES NOW Plaintiffs Joseph Shoemaker and Richard Gindin (“Plaintiffs”) and Defendants Richard Zeitlin, American Technology Services, LLC, Unified Data Services, LLC and Compliance Consultants, LLC (“Defendants”) by and through their undersigned counsel, and hereby notifies the Court that the parties have settled the above-styled action. The parties respectfully request that the Court stay this case for forty (40) days to allow the parties to finalize that settlement. Once the settlement is finalized, the parties will file a Joint Stipulation of Dismissal.

Dated: September 1, 2023

Respectfully submitted,

s/ Max S. Morgan

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Appearing pro hac vice

Attorney(s) for Defendant(s)

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2023, service was made on all Counsel of Record using the Court's ECF service.

/s Max S. Morgan
Max S. Morgan, Esq.